

## **Remarks**

Claims 1 and 61-95 were pending as of the non-final office action mailed on May 5, 2011.

Claims 70, 81 and 92 are being amended for clarification.

Reexamination of the application and reconsideration are respectfully requested in light of the following remarks.

### **I. Examiner Interview Summary**

Examiner Truong is thanked for the courtesies extended to the undersigned during a telephone interview on Monday, August 29, 2011. During the interview, Examiner Truong and the undersigned discussed independent claim 1 and dependent claim 61, and the Schneider (U.S. Patent No. 6,895,430), Hennings (U.S. Patent No. 6,763,496) and O'Donnell (*Law in the Outer Limits?*) references. The Applicant presented arguments consistent with the arguments set forth below. Agreement was not reached.

### **II. Independent Claims 1, 71, 82 and 93**

The Examiner rejected claims 1, 61, 63, 70-72, 74, 81-83, 85 and 92-95 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schneider (U.S. Patent No. 6,895,430) in view of Hennings (U.S. Patent No. 6,763,496) and O'Donnell (*Law in the Outer Limits?*).

The Examiner also rejected claims 1, 61, 63, 70-72, 74, 81-83, 85 and 92 under 35 U.S.C. 103(a) as being unpatentable over Schneider in view of Cupps (U.S. Patent No. 5,991,739) and O'Donnell.

The rejection of claims 1, 71 and 82 over Schneider, Cupps and O'Donnell is addressed in I.A below. The rejection of claims 1, 71 and 82 over Schneider, Hennings and O'Donnell is addressed in section II.B below. The rejection of claim 93 over Schneider, Hennings and O'Donnell is addressed in section I.C below.

#### **A. Claims 1, 71 and 82 Are Not Obvious Over Cupps, Schneider and O'Donnell**

The combination of Cupps, Schneider and O'Donnell does not teach or suggest the claimed active snippet link:

a corresponding active snippet link to a portion of the corresponding search result document, the corresponding active snippet link including a query-relevant snippet, the query-relevant snippet being text extracted from the portion of the corresponding search result document by the search engine, the corresponding active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device.

This feature is claimed in each of claims 1, 71 and 82. The Examiner states that Schneider teaches:

a corresponding active snippet link to a portion of the corresponding search result document, the active snippet link containing a query-relevant snippet, the query-relevant snippet being text extracted from the portion of the corresponding search result document by the search engine" as shown in fig. 6b, each search result including a link such as www.com to a corresponding document but this link is not to a top of a corresponding search result document (figs. 5b-6b, col. 19, lines 40-67; col. 15, lines 25-60)

Non-final office action, page 26. The Examiner also admits that Schneider does not teach:

the corresponding active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device.

The Examiner then relies on O'Donnell for teaching "navigating directly to a portion within a document and a document includes link to a top of the search result document" (Office Action, page 29), and on Cupps for the remainder of the claimed limitations.

The rejection is improper because the Examiner's application of each of Schneider, Cupps and O'Donnell to the claim language is incorrect.

### i. Schneider

Schneider does not teach or suggest “a corresponding active snippet link to a portion of the corresponding search result document, the active snippet link containing a query-relevant snippet, the query-relevant snippet being text extracted from the portion of the corresponding search result document by the search engine” as claimed. This is apparent from Fig. 6c of Schneider, which is described as “the page source of the output discussed in FIG. 6b.” See Schneider, col. 9, ll. 21-22. Both figures are reproduced below:

Results for "software patent"  
1 - 4 next >>

1. SoftwarePatent.com : Software Patent Resources  
WHOIS  
SoftwarePatent.com provides resources and links for: patent searching, laws, case, intellectual property organizations. All links are software, internet and computer patent related  
99% 9/16/99 <http://www.softwarepatent.com/>

2. Software Patent Resource has moved to <http://www.softwarepatent.com>  
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3. Patent Explorer / SoftwareSubset  
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Rapid Patent, in association with Electronic Data Systems (EDS), has developed a single CD-ROM which holds all previously inaccessible software patent data. There are over 7,000 software patents covering 20 years from 1972. Full text searchable  
98% 9/4/99 <http://law.cd-rom-directory.com/cdprod1/cdthree/002/509.shtml>

4. Recent Software Patent Developments In The United States  
WHOIS Homepage Page Source Mets Sitemap After Market Status  
Recent Software Patent Developments In The United States John V. Swinson\* Abstract This article examines recent U.S. developments in patent law concerning computer software.  
The cases discussed are appellate decisions of the Court of Appeals.  
98% 9/24/99 <http://www.comlaw.utexas.edu/law/jlts/patents.html>

*Fig. 6b*

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<html><body>
Results for "software patent"<br>
1 - 4 next >><p>
<a href="http://www.softwarepatent.com">
1. SoftwarePatent.com : Software Patent Resources </a><br>
<a href="http://www.networksolutions.com/cgi-bin/whois/whois?softwarepatent.com">
WHOIS</a><br>
SoftwarePatent.com provides resources and links for patent searching, laws, case, <br>
intellectual property organizations. All links are software, internet and computer patent related<br>
99% 9/16/99 http://www.softwarepatent.com</p>
<a href="http://www.longest.com/spn/spn.shtml">
2. Software Patent Resource has moved to http://www.softwarepatent.com</a><br>
<a href="http://www.networksolutions.com/cgi-bin/whois/whois?longest.com">
WHOIS</a>&nbsp;&nbsp;&nbsp;
<a href="http://www.longest.com">Homepage</a><br>
Software Patent Resource has moved to http://www.softwarepatent.com<br>
98% 9/15/99 http://www.longest.com/spn/spn.shtml</p>

et cetera...

</body></html>
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*Fig. 6c*

In Fig. 6c, “direct links to meta information are shown.” Schneider, col. 20, ll. 1-9. None of these “links” teach the claimed active snippet link as claimed. The Examiner’s assertion that “each search result including a link such as www.com to a corresponding document but this link is not to a top of a corresponding search result document” is incorrect.

**ii. Cupps**

The claimed active snippet link includes “an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device.” The “corresponding search result document,” as claimed, is the “search result document from which the query relevant snippet is extracted.” Cupps teaches that “the creation of the menu web pages 144 is done dynamically at runtime” in response to a customer request:

The online ordering machine 106 generates menu web pages 144 that are specific to a particular customer's request. The creation of the menu web pages 144 is done dynamically at runtime in order to provide data that accommodates a customer's request. The creation of the menu web pages 144 in this manner differs from the prior art online order systems. In the prior art online order systems, the menu web pages are preconfigured and displayed upon request. This becomes a burden to maintain and limits scalability. In the present technology, each menu web page 144 is configured at runtime and customized for a particular customer's request. Thus, each menu web page 144 differs since each customer's request is different as is the customer's location.

FIG. 7 illustrates the components used to dynamically generate a menu web page 144. A web page creation procedure 126 is provided that receives as input one or more customer requests and is linked to the order database 128 and the menu file system 146. The web page creation procedure 126 generates a menu web page 144 based on the input received from the user. The data included in the menu web page 144 is retrieved from the order database 128 and the menu file system 146. The order database 128 contains information such as the operational time of a vendor, the restaurant's logo, the categories of the food products served, and the like. The menu file system 146 includes menu data associated with each vendor. The menu file system 146 includes a number of menu files stored in an encoded binary format for faster retrieval purposes. The web page creation procedure 126 uses the data in the order database 128 and the menu file system 146 to dynamically generate one or more menu web pages 144 that are customized to a customer's request.

See Cupps, col. 8, ll. 43-55 (emphasis added). Thus, Cupps cannot disclose the claimed “instruction” because Cupps discloses a system in which “web page[s] [are]....configured at runtime and customized for a particular customer's request.” In Cupps, “each menu web page 144 is configured at runtime and customized for a particular customer's request.” Id.

On page 28 of the Office Action, the Examiner states that the relied upon portions of Cupps show “that as Enzo's is extracted from web page of fig. 8 to display to a user in another web page of fig. 9 by a search engine after a user selection.” This assertion, however, is inconsistent with the express teachings of Cupps cited above, i.e., “the data included in the menu web page 144 is retrieved from an order database 128 and the menu file system 146” and “the creation of the menu web pages 144 is done dynamically at runtime.” Id.

The Applicant has pointed out this error to the Examiner multiple times, and each time in response the Examiner ignores the express teachings of Cupps. See, e.g., the Examiner's response to arguments on page 4-6 of the Office action. For example, the Examiner, on page 6 of the Office Action, states that "Pesce fresco is represented as the query-relevant snippet that is selected by a user from a display of the correspond search results on the customer device." The claim language, no matter how broadly interpreted, cannot support the Examiner's conclusion, because Pesce fresco is not a snippet "being text extracted from the portion of the corresponding search result document by the search engine" as claimed. Instead, in Cupps the "menu web page 144 was created in response to the customer's request for 'pesce fresco' selections." Cupps, col. 9, ll. 31 – 33).

Furthermore, taken together, Cupps and Schneider do not teach the claimed instruction for the active snippet link as neither suggests an instruction "that causes the client device to navigate directly to the portion of the corresponding search result document."

### **iii. O'Donnell**

O'Donnell does not remedy the shortcomings of Cupps and Schneider. The Examiner states on page 29 of the Office action that:

Donnell teaches navigating directly a portion within a document and a document includes link to a top of the search result document. The defenders also operated a web site which had on its front page the heading "The Shetland News". Adverts appeared on that page and additionally, there were several news headlines also appearing. Since approximately 14 October 1996, among the defenders' headlines were some which had appeared in recent issues of The Shetland Times which had been reproduced on the pursuers' web site. These particular headlines were verbatim accounts of the pursuers' headlines. Any visitor to the defenders' site could "click" on one of [t]hose particular headlines as it appeared on the defenders' front page and gain access to the text as published and reproduced by the pursuers bypassing the pursuers' home page and any advertising on it (pages 1-3).

The cited portion of O'Donnell, however, fails to teach or suggest a "search result" or "navigating directly a portion within a document and a document includes link to a top of the search result document." Pages 6-7 of O'Donnell describe:

Another interesting point arises from the suggestion (briefly discussed by Groves 1997, p 42) that the pursuers may have given an implied licence to the accessing of their information in the way that is inevitable on the Internet (i.e. bypassing the front page when accessed from a linking page). The pursuers presumably were familiar with the workings of the Internet and were sufficiently au fait with it to have operated a web site. They could not therefore claim any ignorance of the possibilities of linking pages going straight to the text of their stories and the caller not being forced to proceed through each individual page of the pursuers' site starting with the front page. Even if they were not aware of the existence of other sites which had constructed links to their stories, they should have been aware of the operation of "search engines" (e.g. "Yahoo" and "Alta Vista"). In using a "search engine" a caller would enter a key word in their search and the result of the search would go straight to the relevant page (i.e. not necessarily front page) of a site. Again, it is impossible to gauge the weight which such an argument may have had because it was not even mentioned in passing by the defendants' Counsel. If it were to be held that when a web site owner creates a site and puts information on it then he impliedly consents to its use by others then there may be a return to what was the initial view (and some might say spirit) of the Internet which was as a huge, free, informational resource. This may be a sustainable argument in the context of the Internet but, of course, the ramifications for newspaper proprietors could be quite severe. As already mentioned, there has been an indication of judicial awareness of informal customs in journalistic practice regarding the "reverse engineering" of rival newspapers' stories, the natural conclusion of the argument of implied licence may well seem to some that they have arrived at the bottom of a very slippery and not very lucrative slope.

In addition, O'Donnell explains that "[i]n using a "search engine" a caller would enter a key word in their search and the result of the search would go straight to the relevant page (i.e. not necessarily front page) of a site". Accordingly, O'Donnell is just as lacking as Cupps and Schneider with respect to an "active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted."

Additionally, during the telephone interview, the Examiner also referred to the HREF linking of O'Donnell as supporting the rejection. HREF linking, however, does not teach or suggest an “active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device” as claimed.

**iv. The Rationale For Combining O'Donnell, Cupps and Schneider is Faulted**

On page 29 of the Office Action, the Examiner states:

It would have been obvious to a person of an ordinary skill in the art at the time the invention was made to apply Cupp's teaching of using the creation procedure 126 to navigate a portion of search result based on user's selection and Donnell's teaching of navigating directly a portion within a document and a document includes link to a top of the search result document to Schneider's system in order to allow a client to narrow down search result or view each portion of a document following his or her desire so that searching a search result is performed quickly.

The rationale is faulted for multiple reasons. First, as described above, O'Donnell does not teach navigating “directly to the portion of the corresponding search result document” as claimed. There is no such teaching in O'Donnell.

Second, there can be no motivation or suggestion to combine Cupps with any of the other references, as it does not make sense to one of ordinary skill in the art to apply the web page creation procedure 126 of Cupps to navigate to a portion of a document. To navigate to a portion of a document that includes query relevant text shown in an active snippet, the document must exist before being navigated to. The system of Cupps builds web pages “dynamically at run time.” See Cupps, col. 8, ll. 43 – 55.

Third, Cupps teaches away from Schneider. The relied-upon portions of Schneider teach “hyperlink” references that each “accesses the URL displayed in the last line of each search

result" and "metalinks...enabling the user to retrieve meta-information about the URI." See Schneider, col. 19, ll. 44-54. In Cupps, "each menu web page 144 is configured at runtime and customized for a particular customer's request." See Cupps, col. 8, ll. 43-55. Furthermore, with respect to "prior art online order systems," Cupps states that "the menu web pages are preconfigured and displayed upon request. This becomes a burden to maintain and limits scalability." Cupps, col. 8, ll. 43-49. Thus one of ordinary skill would not use Cupps in combination with Schneider "to access the URL displayed...in search result[s]."

Finally, the Examiner did not provide a rational underpinning that is required to support a legal conclusion of obviousness. The Examiner's reason for combining Schneider and Cupps with O'Donnell is that applying "Cupp's teaching of using the creating procedure 126 to navigate to a portion of search result based on user's selection to Schneider's system in order to allow a client to narrow down search result following his or her desire so that searching a search result is performed quickly." Assuming *arguendo* Cupps does not teach away from Schneider, the Examiner's bases for the combination are not a rational underpinning that is required to support a legal conclusion of obviousness. KSR International Co. v. Teleflex Inc., 127 S.Ct. 1727, 1741 (2007). In the combination envisioned by the Examiner, a user's selection of a search result in Schneider would cause the creating procedure 126 to dynamically generate a copy of the search result document addressed by the universal resource locator for only that user. Such an amalgam of two disparate and inconsistent systems appears to make little sense.

For at least these reasons, each of the independent claims, and their respective dependent claims, distinguish over the combination of Cupps, Schneider and O'Donnell.

**B. Claims 1, 71 and 82 are Not Obvious Over Schneider, Hennings and O'Donnell**

With respect to claims 1, 71 and 82<sup>1</sup>, the combination of Hennings, Schneider and O'Donnell does not teach or suggest the claimed active snippet link:

a corresponding active snippet link to a portion of the corresponding search result document, the corresponding active snippet link including a query-relevant snippet, the query-relevant snippet being text extracted from the portion of the corresponding search result document by the search engine, the corresponding active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device.

This feature is claimed in each of claims 1, 71 and 82. The Examiner states that Schneider teaches:

a corresponding active snippet link to a portion of the corresponding search result document, the active snippet link containing a query-relevant snippet, the query-relevant snippet being text extracted from the portion of the corresponding search result document by the search engine" as shown in fig. 6b, each search result including a link such as www.com to a corresponding document but this link is not to a top of a corresponding search result document (figs. 5b-6b, col. 19, lines 40-67; col. 15, lines 25-60)

Non-final office action, page 8. Then at pages 8 – 9 of the Office Action, the Examiner admits that Schneider does not teach:

the corresponding active snippet link including an instruction that causes the client device to navigate directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device.

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<sup>1</sup> The Examiner does not provide a detailed rejection of claim 82 over Hennings, Schneider and O'Donnell. Accordingly, for this additional reason, the rejection of claim 82, and all of its dependent claims over Hennings, Schneider and O'Donnell cannot stand.

The Examiner then relies on O'Donnell for teaching "navigating directly to a portion within a document and a document includes link to a top of the search result document" (Office Action, page 29), and on Hennings for the remainder of the claimed limitations.

The rejection is improper because the Examiner's application of each of Schneider, Hennings and O'Donnell to the claim language is incorrect.

### **i. Schneider and O'Donnell**

The Examiner uses the same rationale with respect to Schneider and O'Donnell in the combination with Hennings as used in the combination with Cupps. Thus, for at least the reasons set forth with respect to claims 1, 71 and 82 as set forth in section I.A above, the rejection over Schneider, O'Donnell and Hennings is incorrect. In particular, Schneider does not support the finding that "each search result including a link such as www.com to a corresponding document but this link is not to a top of a corresponding search result document" as the Examiner asserts on page 8 of the Office Action. Furthermore, O'Donnell does not disclose "navigating directly a portion within a document" as asserted on page 10 of the Office Action. For at least these reasons alone, the rejection of claims 1, 71 and 82 over Hennings, Schneider and O'Donnell is improper.

### **ii. Hennings**

In rejecting claim 1, the Examiner states that Fig. 2, col. 6 ll. 47-60 and col. 3, ll. 5-30 of Hennings "shows that the script is created for search results to allow a user to navigate directly a portion of the result document travel ticket." The script is represented as an instruction for search results." Office Action, page 9. Fig. 2 and the above-cited portions of Hennings are reproduced below:

Another kind of document object in a web page is a "script." A script is an executable program, or a set of commands stored in a file, that can be run by a server program called a Web server (described below) to produce an HTML document that is then returned to the Web browser. Typical script actions include running library routines or other applications to fetch information from a file or a database, or initiating a request to obtain information from another machine, or

retrieving a document corresponding to a selected hypertext link. A script may be run on the Web server when, for example, the end user selects a particular hypertext link in the Web browser, or submits an HTML form request. Scripts are usually written by a service developer in an interpreted language such as Basic, Practical Extraction and Report Language (Perl), or Tool Control Language (Tcl) or one of the Unix operating system shell languages, but they also may be written in more complex programming languages such as "C" and then compiled to produce an executable program. Programming in Tcl is described in more detail in *Tcl and the Tk Toolkit*, by John K. Ousterhout, Addison-Wesley, Reading, Mass., USA, 1994. Perl is described in more detail in *Programming in Perl*, by Larry Wall and Randal L. Schwartz, O'Reilly & Associates, Inc., Sebastopol, Calif., USA, 1992. JAVA and ACTIVEX programs are also frequently employed in web pages to implement various tasks. (Hennings, col. 3, ll. 5-30).

As discussed above, a user typically views documents on the Internet with a web browser. The web browser is able to distinguish hyperlinks from other HTML content, which allows the browser to highlight the hyperlink anchors and/or change the cursor shape and/or color to inform the user that the underlying text or graphic is a hyperlink. The user can navigate a site or the web by simply clicking on various hyperlink anchors. (Hennings, col. 6, ll. 45-52).

Although hyperlinks are a necessary and valuable feature, they only provide limited information to the user. For instance, the only component the user sees is the hyperlink anchor display text or the picture icon. In some cases, there is other descriptive text that is posted in proximity to the hyperlink or picture icon, such as the text a user sees below hyperlinks on a search report page issued by an Internet search engine. This additional descriptive text must be either be encoded into the HTML document (as is the case for most web pages), or be dynamically generated with an HTML script (as is true for search engine pages). In either case, the descriptive text is not inherently tied to the hyperlink. (Hennings, col. 6, ll. 53-64).

Contrary to the Examiner's assertion, nothing in the above-quoted portion of Hennings "shows that the script is created for search results to allow a user to navigate directly a portion of the result document travel ticket."

### **iii. The Rationale For Combining O'Donnell, Hennings and Schneider is Faulted**

On page 10 of the Office Action, the Examiner states:

It would have been obvious to a person of an ordinary skill in the art at the time the invention was made to apply Hennings's teaching of using the creation procedure 126 to navigate a portion of search result based on user's selection and

Donnell's teaching of navigating directly a portion within a document and a document includes link to a top of the search result document to Schneider's system in order to allow a client to narrow down search result or view each portion of a document following his or her desire so that searching a search result is performed quickly.

Again, the rationale is faulted for multiple reasons. First, as described above, O'Donnell does not teach navigating "directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted." There is no such teaching in O'Donnell.

Second, there is no "creation procedure 126" in Hennings. The only "126" element in Hennings is a hyperlink, and the hyperlink is not a "creation procedure." Thus the Examiner's rationale with respect to Hennings is unsupported by Hennings. For this reason alone, there is no support for combining Hennings with Schneider and O'Donnell.

For at least these reasons, each of the independent claims, and their respective dependent claims, distinguish over the combination of Hennings, Schneider and O'Donnell.

### **C. Claims 93 - 95 Are Not Obvious Over Schneider, Hennings and O'Donnell**

Claim 93 is similar in scope to claims 1, 71 and 82, but also includes the limitation "the active snippet link being the hyperlink and an artificial anchor appended to the hyperlink that references the portion for the search result document, the artificial anchor being undefined in the search result document."

For at least the reasons provided in section I.B above, claim 93 is allowable over Hennings, Schneider and O'Donnell. Furthermore, the Examiner does not even address the language "an artificial anchor appended to the hyperlink that references the portion for the search result document, the artificial anchor being undefined in the search result document." The totality of the Examiner's rejection of claim 93 does not even address the above quoted claim language. For example, nowhere in the Office Action does the Examiner explain how Hennings or O'Donnell teach an "artificial anchor appended to the hyperlink that references the portion for the search result document, the artificial anchor being undefined in the search result document."

The element is completely ignored. Furthermore, nothing in Hennings or O'Donnell teaches or suggests the claimed "artificial anchor appended to the hyperlink that references the portion for the search result document, the artificial anchor being undefined in the search result document."

Finally, the rationale provided on pages 19 – 20 of the Office Action supporting the combination is faulted for multiple reasons. First, as described above, O'Donnell does not teach navigating "directly to the portion of the corresponding search result document from which the query-relevant snippet is extracted" There is no such teaching in O'Donnell.

Second, there is no "creation procedure 126" in Hennings. The only "126" element in Hennings is a hyperlink, and the hyperlink is not a "creation procedure." Thus the Examiner's rationale with respect to Hennings is thus unsupported by Hennings. For this reason alone, there is no support for combining Hennings with Schneider and O'Donnell.

For at least these reasons, claim 93, and its respective dependent claims, distinguish over the combination of Hennings, Schneider and O'Donnell.

With respect to claims 94 and 95, the Examiner states that Figs. 1A, 2, and col. 4, ll. 45 – 55 and col. 6, ll. 47-60 teach the claimed limitations of "wherein each artificial anchor includes a preassigned artificial anchor designator designating the anchor as artificial" (claim 94) and "wherein each artificial anchor includes the preassigned artificial anchor designator as one of a prefix and a suffix and wherein the preassigned artificial anchor designator includes a preassigned set of text characters" (claim 95).

The text of col. 6, ll. 47-60 of Hennings is reproduced above. The text of col. 4, lines 45 – 55 of Hennings reads as follows:

For example, FIG. 1A shows text having a document URL 10, a base element 12, a hypertext link with an absolute URL 14, and a hypertext link with a relative URL 16, which is evaluated with respect to base URL 12 to produce a resulting URL 18. As an additional example, FIG. 1B shows text having a document URL 20, no base element, a hypertext link with an absolute URL 22, and a hypertext link with a relative URL 24, which is evaluated with respect to document URL 20 to produce a resulting URL 26.

This passage of Hennings simply describes "URL[s]". There is no teaching of "each artificial anchor includes a preassigned artificial anchor designator designating the anchor as

“artificial” nor of “each artificial anchor includes the preassigned artificial anchor designator as one of a prefix and a suffix and wherein the preassigned artificial anchor designator includes a preassigned set of text characters.” For this additional reason the rejection of claims 93 and 94 is improper.

If the Examiner maintains the rejection, the Examiner is specifically requested to explain how the above passage teaches the claimed subject matter.

### **III. Dependent Claims 65 – 67, 76 – 78, and 87 – 89**

Claims 65-67, 76-78, 87-89 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Schneider in view O'Donnell and Hennings or Cupps, and further in view of and Caronni (U.S. Patent Pub. No. 2003/0154221) (Office Action, pages 20 and 38).

With respect to claims 65, 76 and 87, Caronni does not teach an “intra-document link includes an artificial anchor undefined in the corresponding search result document.” The Examiner states that “[t]he link “S:\eng\user123\file 1.txt contains user123 as an artificial anchor; thus, the lookup routine expands the entity name with a second uncommon string for searching (fig. 4, paragraphs [0030, 0037]” (Office Action, at page 21). The “entity name” being searched, however, is “a directory name or file name” (Caronni, paragraph 27), e.g., “file 1.txt” (Caronni, at paragraph 0037). Thus Caronni does not teach an “intra-document link includes an artificial anchor undefined in the corresponding search result document.” Furthermore, the text “user123” is part of “S:\eng\user123\file1.txt” (see Caronni, para. 35, “the location 406, indicating the network location (e.g., a UNIX node) of the file system entity”), and thus is not an “intra-document link.” (“Assuming that access is permitted, the lookup routine returns a location of “S:\eng\user123\file1.txt” to the requesting node” Caronni, paragraph [0037], emphasis added). The text “S:\eng\user123\file1.txt” is thus not an “intra-document link” that includes “an artificial anchor undefined in the search document.”

With respect to claims 66, 77 and 88, Caronni does not teach “each artificial anchor includes a preassigned artificial anchor designator designating the anchor as artificial.” The Examiner states that “S:\eng\” is represented as an artificial anchor designator. The text

“S:\eng\” is part of the location. Thus the text “S:\eng\” is not a “preassigned artificial anchor designator” as claimed.

With respect to claims 67, 78 and 89, Caronni does not teach that each artificial anchor includes “a preassigned artificial anchor designator as one of a prefix and a suffix and wherein the preassigned artificial anchor designator includes a preassigned set of text characters.” For the reasons set forth above, “S:\eng\” is not “a preassigned artificial anchor designator designating the anchor as artificial.”

For at least these reasons, claims 65-67, 76-78, 87-89 are distinguishable over the applied combinations of Hennings, Cupps, O'Donnell, Schneider and Caronni.

#### **IV. Conclusion**

The allowability of all of the pending claims has been addressed. The absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment or cancellation of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment or cancellation.

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Applicant : Marmaros et al.  
Serial No. : 10/750,183  
Filed : December 31, 2003  
Page : 28 of 28

Attorney's Docket No.: 16113-1317001

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